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VIA FEDERAL EXPRESS

August 21, 1997

Attention: Rules Processing Team
Department of the Interior
Minerals Management Service
381 Elden Street, Mail Stop 4700
Herndon, VA 20170-4817

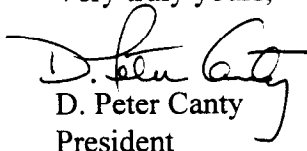
Re: Notice of proposed rulemaking
30 CFR Part 253, RIN 1010-AC33
62 Federal Register 14052 (03/25/97)
"Oil Spill Financial Responsibility for
Offshore Facilities"

Gentlemen:

Stone Energy Corporation ("Stone") endorses the comments and changes on the captioned proposed rulemaking developed by the the American Petroleum Institute ("API"), the Independent Petroleum Association of America ("IPAA"), and/or the Offshore Operators Committee ("OOC"), collectively referred to as the "Associations." Stone requests that the Minerals Management Service make the changes proposed by the Associations and then re-propose said rules for additional comment. Of particular importance to Stone are the comments and suggested changes with respect to (a) the "Designated Applicant" concept, (b) the geographic scope of "offshore" facilities, (c) the amount of the oil spill financial responsibility ("OSFR") that must be demonstrated, (d) the effective date for calculating the amount of OSFR, (e) self-insurance provisions, particularly alternative testing, (f) the use of insurance to meet the OSFR requirements, (g) the "add-on" and "drop" provisions, and (h) the burdensome reporting obligations and forms.

Should you have any questions concerning this, please let us know.

Very truly yours,


D. Peter Canty
President